

## REMARKS

Claims 1, 11, 18, 19, 26 and 27 have been amended. Claims 1 – 30 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

### Section 112, Second Paragraph Rejection:

The Office Action rejected claims 18 and 26 under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicants submit that these rejections have now been overcome.

### Section 103(a) Rejection

The Office Action rejected claims 1-12, 14, 16, 18-20, 22, 24 and 26-30 under 35 U.S.C. § 103(a) as being unpatentable over Foody, et al. (U.S. Patent 5,732,270) (hereinafter "Foody") in view of Lynch, et al. ("Web Enabled TMN Manager") (hereinafter "Lynch").

Foody teaches a system and method wherein objects from multiple heterogeneous object systems may interoperate by creating a native proxy object for each foreign object. (Abstract) Specifically, the system comprises a plurality of frameworks for dealing with objects, as well as extensions for each of the frameworks. These extensions are grouped by object system and packaged into libraries called Object System Adapters (OSAs), thereby providing the necessary functionality to support new object systems and provide full interoperability with other object systems. (Col. 7, lines 3 – 34)

Applicant can find no language in Foody or Lynch which teaches or suggests “a **plurality of plug-in mapping modules, wherein each of the plurality of mapping modules is operable to provide a unique mapping for a set of managed object data types between the same two languages for describing data associated with managed**

objects, wherein one of the two languages is an interface definition language (IDL) and the other of the two languages is an abstract syntax notation” as recited in Applicant’s claim 1. Foody teaches a system wherein the Type Description Framework provides a mapping between each of the plurality of object systems represented by OSAs. Each mapping in Foody is for a different object system. There is no teaching in Foody or Lynch that multiple different mappings between the same two languages for describing data associated with managed objects can be provided in the framework. It appears from Foody’s teachings that when a particular OSA is registered for an object system, that same OSA is used for all communications for that object system.

Similar arguments apply to each of the other independent claims.

Applicants also assert that numerous ones of the dependent claims recited further distinctions over the cited art. Since the independent claims have been shown to be patentably distinct, a further discussion of the dependent claims is not necessary at this time. However, a few examples of further distinctions are noted as follows.

For example, Applicant can find no language in Foody or Lynch which teaches or suggests “a mapping framework, wherein the mapping framework is operable to receive the plurality of plug-in mapping modules, **wherein the mapping framework comprises a plurality of processes which are concurrently executable,**” as recited in Applicant’s claim 4. The Examiner states that the mapping framework of Foody comprises a plurality of processes which are concurrently executable in that processes represented by modules of the framework run in Windows NT, which is a multitasking system. However, while Windows NT is a multitasking system, processes which execute on a multitasking system may not necessarily be composed of a plurality of concurrently executable processes. Thus, just because Foody’s modules may run in Windows NT does not mean that Foody’s framework comprises a plurality of processes which are concurrently executable.

Additionally, Applicant can find no language in Foody or Lynch which teaches or suggests a method in which “the mapping framework comprises a converter framework

library, wherein the converter framework library comprises a set of abstract classes which provide an interface for the one or more plug-in mapping modules, and wherein the interface comprises wrappers to a plurality of corresponding converter implementation classes,” as recited in Applicant’s claim 7. While Foody’s frameworks 1 – 9 are object-oriented, Applicant can find no teaching or suggestion that Foody’s frameworks 1 – 9 comprise a set of abstract classes.

#### **Claims Objected To But Otherwise Allowable:**

Claims 13, 15, 17, 21, 23 and 25 were rejected as being dependent upon a rejected base claim but otherwise allowable if rewritten in independent form. As such, Applicants assert that claims 13, 15, 17, 21, 23 and 25 are allowable as depending from patentably distinct base claims. Applicants therefore respectfully request allowance of claims 13, 15, 17, 21, 23 and 25 as currently pending.

#### **INFORMATION DISCLOSURE STATEMENT:**

The Examiner stated that the related applications listed on p. 2 of the Information Disclosure Statement filed on February 12, 2002 should be listed on a PTO-1449. However, M.P.E.P. § 609(III)(D) expressly states “Applicants may wish to list U.S. patent application numbers on other than a form PTO-1449 ... to avoid the application numbers of pending applications being published on the patent.” Thus, there is clearly no requirement to list the co-pending applications on a PTO-1449. M.P.E.P. § 609(III)(C)(2) states “If the citations are submitted on a list other than on a form PTO-1449 ... the examiner may write ‘all considered’ and his or her initials to indicate that all citations have been considered. Since the IDS of February 12, 2002 was submitted in full compliance with all appropriate rules and regulations, Applicants request the Examiner to carefully consider the cited applications and return an indication with the next action that the listed applications have been considered. Applicants also note that the Examiner has not yet returned a signed and initialed copy of the form PTO-1449 that was submitted with the same IDS.

## CONCLUSION

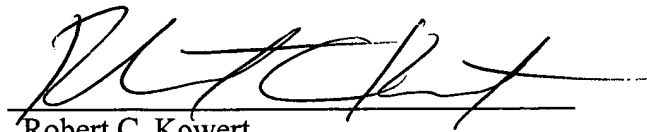
Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above referenced application from becoming abandoned, Applicants hereby petition for such extension. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-48300/RCK.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Notice of Change of Address
- ☐ Fee Authorization Form authorizing a deposit account debit in the amount of \$  
for fees (        ).
- ☐ Other

Respectfully submitted,



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